

REMARKS

Favorable reconsideration of this application is requested in view of the above amendments and in light of the following remarks and discussion.

Claims 1-28 remain pending. Claims 1, 13, 14 and 20-28 are amended. Support for the changes to the claims is self-evident from the originally filed disclosure, including the original claims, and therefore no new matter is added. Specifically, support is provided by at least paragraph [06] of the originally filed specification.

Initially, Applicants express thanks for the courtesies extended by Examiner Coleman and Primary Examiner Nash during an interview with Applicants' representative, Philip Hoffmann, on December 12, 2007. The substance of the interview is set forth below.

In the Office Action claims 20-28 are rejected as being indefinite. Contrary to the Office Action's assertion that there is no mention of a traction device in the specification, it is submitted that paragraph [15] of the originally filed application refers to a traction device. Although it is further submitted that the referenced and claimed traction device is understood by one of ordinary skill in the art not to be limited to tires, claim 20 is amended to remove the recitation of a traction device. It is therefore requested that this rejection be withdrawn.

Claims 1, 2, 7-9, 11 and 13-17 are rejected as unpatentable over US patent 5,215,044 to Banzhaf et al. (Banzhaf) in view of US patent publication 2002/0029755 to Ito et al. (Ito); claim 12 is rejected as unpatentable over Banzhaf in view of Ito, and further in view of US patent 1,632,636 to Treadwell et al. (Treadwell); claims 3-5, 18, 20-24 and 26-28 are rejected as unpatentable over Banzhaf in view of Ito, and further in

view of US patent 5,794,575 to Sonnemann et al. (Sonnemann); claim 10 is rejected as being unpatentable over Banzhaf and Ito in combination with Sonnemann and Treadwell; and claims 6, 19 and 25 are rejected as being unpatentable over Banzhaf and Ito in combination with Sonnemann, and further in view of US patent 5,427,062 to Chamot et al. (Chamot). It is requested that the rejections of the claims be withdrawn, and that the claims be allowed, for the following reasons.

As discussed during the interview, it is submitted that Banzhaf does not disclose or render obvious the claimed features of an engine having a first coolant circuit, and an auxiliary power unit configured to produce power which has a second coolant circuit, where the first coolant circuit is in fluid communication with the second coolant circuit, as recited in independent claim 1.

Banzhaf discloses a cooling system for a vehicle having an internal combustion engine. As shown in Figure 6 of Banzhaf, a main cooling circuit cools a head 71 and an engine block 70 of an internal combustion engine 1. See from column 6, line 67 to column 7, line 17, of Banzhaf. A secondary cooling circuit includes a pump 52, which is driven by an electric motor. The pump 52 pumps fluid through various components, including through heat exchangers 43 and 90 that cool engine oil and transmission oil of the engine 1. See column 7, lines 18-54, of Banzhaf.

It is submitted, however, that the pump 52 of the secondary cooling circuit in Banzhaf does not produce power. Because Banzhaf is not concerned with and does not even contemplate an auxiliary power unit configured to produce power, Banzhaf does not disclose or render obvious the claimed features of an engine having a first coolant circuit, and an auxiliary power unit configured to produce power having a

second coolant circuit, where the first coolant circuit is in fluid communication with the second coolant circuit, as recited in independent claim 1.

It is further submitted that none of Ito, Treadwell, Sonnemann and Chamot remedy the above-discussed deficiencies of Banzhaf with respect to the claimed features recited in independent claim 1. The withdrawal of the rejection and the allowance of independent claim 1 are therefore requested.

As also discussed during the interview, independent claim 14 recites features similar to those recited in independent claim 1. Thus, for reasons as least similar to those discussed with respect to claim 1, the withdrawal of the rejection and the allowance of independent claim 14 are requested.

With respect to independent claim 13, as discussed with the Examiners, it is submitted that Banzhaf does not disclose or render obvious the claimed features of an engine having a first coolant circuit, and an auxiliary power unit including a secondary engine having a second coolant circuit, where the first coolant circuit is in fluid communication with the second coolant circuit, as recited in independent claim 1. As discussed above, the pump 52 of the secondary cooling circuit in Banzhaf is not an engine. Thus, because Banzhaf is not concerned with and does not even contemplate an auxiliary power unit including an engine, Banzhaf does not disclose or render obvious the claimed features recited in independent claim 13.

Independent claim 20 recites features similar to those recited in independent claim 13. Thus, for reasons as least similar to those discussed with respect to claim 13, the withdrawal of the rejection and the allowance of independent claim 20 are requested.

It is submitted that features of the remaining claims, which depend from independent claims 1, 13, 14 and 20, are not disclosed or rendered obvious by combinations of Banzhaf, Ito, Treadwell, Sonnemann and Chamot. The withdrawal of the rejections and the allowance of the remaining, dependent claims are therefore requested.

In view of the foregoing amendments and remarks, reconsideration and reexamination of this application, and the timely allowance of the pending claims, is requested.

Please grant any extensions of time required to enter this response and charge any additional required fees to our deposit account 06-0916.

Respectfully submitted,

FINNEGAN, HENDERSON, FARABOW,
GARRETT & DUNNER, L.L.P.

Dated: January 10, 2008

By: _____



Philip J. Hoffmann
Reg. No. 46,340